



FARM

Farm Animal Reform Movement

10101 Ashburton Lane, Bethesda MD 20817; 301-530-1737

August 2, 2000

Dockets Management Branch
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

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Re: Irradiation in the Production, Processing and Handling of Eggs (Docket No. 98F-0165 HFA-305)

We appreciate this opportunity to submit our comments and to request a hearing concerning the Food and Drug Administration's decision to legalize the irradiation of eggs. We request that implementation of the new regulation be delayed until a public hearing may be held.

FARM is a nonprofit organization representing over 17,000 members in the US. Our mission is to promote sustainable, humane farming practices through grassroots outreach campaigns. We oppose the FDA's decision to allow irradiation of eggs because (1) it will not ensure consumer safety and (2) it ignores the source of the problem, namely, unsanitary and inhumane farming practices.

Irradiation of eggs will not effectively eliminate dangerous pathogens from contaminated eggs. Both government and industry point out that irradiation of eggs cannot substitute for sanitation, or for recommended packaging, refrigeration, cooking, and serving of eggs. "Irradiation of fresh shell eggs at the doses requested in the petition will reduce, but not entirely eliminate, microorganisms in eggs," according to the Federal Register, July 21, 2000. The most targeted pathogen, SE, has been shown to be the most irradiation resistant type of Salmonella (Brown, 1994) following exposure to approved levels of radiation of meat and eggs up to 3.0 kiloGrays (kGy).

Irradiation of eggs fails to address the cause of egg contamination: unsanitary and inhumane farming practices. Conventionally raised egg-laying hens live in overcrowded, filthy buildings. They are subjected to stress-inducing practices such as forced molting and artificial lighting schedules, which increase their susceptibility to Salmonella infection. According to the US Department of Agriculture, "[E]xtended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis (Se) by laying hens subjected to these practices" (Stolfa, August 21, 1998). USDA also states there is epidemiological evidence which associates [forced] molting with higher prevalence of SE in flocks.

Irradiation is nothing more than a band-aid approach to a serious public health issue. Please consider holding a public meeting on the issue of egg irradiation so that consumers may get a better picture of what is at stake regarding egg safety.

Sincerely, 
Lucy Goodrum, Esq.

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 Recycled Paper

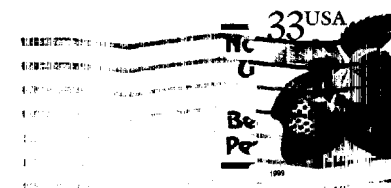
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ADDRESS SERVICE REQUESTED

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